

#### United States Government

## NATIONAL LABOR RELATIONS BOARD

#### OFFICE OF THE GENERAL COUNSEL

Washington, D.C. 20570

December 3, 2024

David J. Smith Clerk of the Court U.S. Court of Appeals for the 11th Circuit 56 Forsyth Street, NW Atlanta, GA 30303

Re: *Amazon.com Services, LLC v. National Labor Relations Board* 11th Cir. No. 24-13819
Board Case Nos. 29-CA-280153, 29-CA-286577, 29-CA-287614, 29-CA-290880, 29-CA-292392 and 29-CA-295663

#### Dear Mr. Smith:

I am enclosing the National Labor Relations Board's cross-application for enforcement of its Order against the Petitioner, Amazon.com Services, LLC, in the above-captioned case.

Please serve a copy of the cross-application on the Petitioner, Amazon.com Services, LLC, whose address appears on the service list. I have served a copy of the cross-application on each party admitted to participate in the Board proceedings, and their names and addresses also appear on the service list. I am counsel of record for the Board, and all correspondence should be addressed to me. The Board attorneys directly responsible for this case are Kira Dellinger Vol, (202) 273-0656, and Micah P.S. Jost, (202) 273-0264.

Very truly yours,

/s/ Ruth E. Burdick

Ruth E. Burdick Deputy Associate General Counsel NATIONAL LABOR RELATIONS BOARD 1015 Half Street, SE Washington, DC 20570 (202) 273-2960

Encls.

#### **SERVICE LIST**

*Amazon.com Services, LLC v. NLRB*, 11<sup>th</sup> Cir. No. 24-13819 Board Case Nos. 29-CA-280153, 29-CA-286577, 29-CA-287614, 29-CA-290880, 29-CA-292392 and 29-CA-295663

Amber M. Rogers, Esq.

Hunton Andrews Kurth LLP

1445 Ross Avenue, Suite 3700

Dallas, TX 75202

Phone: (214) 468-3308

Fax: (214) 880-0011

Email: arogers@huntonak.com

Kurt G. Larkin, Esq.

Hunton Andrews Kurth LLP

951 East Byrd Street

Richmond, VA 23219

Phone: (804) 788-8776

Fax: (804) 788-8218

Email: klarkin@hunton.com

Elbert Lin, Esq.

Hunton Andrews Kurth LLP

951 East Byrd Street

Richmond, VA 23219

Phone: (804) 788-8200 Fax: (804) 788-8218

Email: elin@hunton.com

Kevin S. Elliker, Esq.

Hunton Andrews Kurth LLP

951 East Byrd Street

Richmond, VA 23219

Phone: (804) 788-8256

Fax: (804) 788-8212

Email: kelliker@hunton.com

Petitioner's Counsel

Petitioner's Counsel

Petitioner's Counsel

Petitioner's Counsel

### SERVICE LIST (cont'd)

*Amazon.com Services, LLC v. NLRB*, 11<sup>th</sup> Cir. No. 24-13819 Board Case Nos. 29-CA-280153, 29-CA-286577, 29-CA-287614, 29-CA-290880, 29-CA-292392 and 29-CA-295663

Felipe Santos, General Manager

Petitioner

Amazon.com Services, Inc.

546 Gulf Avenue

Staten Island, NY 10314

Phone: (855) 579-1766 Mobile: (855) 579-1766

Seth Lewis Goldstein, Esq.

Law Offices of Seth Goldstein

217 Hadleigh Drive

Cherry Hill, NJ 08003

Phone: (646) 460-1309

Email: sgold352002@icloud.com

Dana Joann Miller

23 Prospect Avenue

Staten Island, NY 10301

Phone: (407) 233-8166

Email: danamoot@yahoo.com

Charging Party's Counsel

**Charging Party** 

# UNITED STATES COURT OF APPEALS FOR THE ELEVENTH CIRCUIT

AMAZON.COM SERVICES, LLC	)	
Petitioner	)	No. 24-13819
v.	)	Board Case Nos. 29-CA-280153,
NATIONAL LABOR RELATIONS BOARD	)	29–CA–286577, 29–CA–287614, 29–CA–290880, 29–CA–292392
Respondent	)	and 29–CA–295663

# CROSS-APPLICATION FOR ENFORCEMENT OF AN ORDER OF THE NATIONAL LABOR RELATIONS BOARD

The National Labor Relations Board hereby cross-applies to the Court for enforcement of its Order issued against Amazon.com Services, LLC on November 13, 2024 in Board Case Nos. 29–CA–280153, 29–CA–286577, 29–CA–287614, 29–CA–290880, 29–CA–292392 and 29–CA–295663, reported at 373 NLRB No. 136. On November 21, 2024, the Petitioner, Amazon.com Services, LLC, filed a petition with this Court to review the same Board Order. The Board seeks enforcement of its Order in full.

The Court has jurisdiction over this cross-application pursuant to Section 10(e) and (f) of the National Labor Relations Act (29 U.S.C. § 160(e) and (f)) because the Petitioner is aggrieved by the Board's Order. Venue is proper in this Circuit under Section 10(e) and (f) of the Act.

/s/ Ruth E. Burdick

Ruth E. Burdick Deputy Associate General Counsel NATIONAL LABOR RELATIONS BOARD 1015 Half Street, SE Washington, DC 20570 (202) 273-2960

Dated at Washington, DC this 3rd day of December 2024